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*Attorneys for Defendants Kevin Long and  
Millcreek Commercial Properties, LLC*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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KATE GRANT and KARMANN KASTEN,  
LLC,

Plaintiffs,

vs.

KEVIN LONG; MILLCREEK  
COMMERCIAL PROPERTIES, LLC;  
COLLIERS INTERNATIONAL; BRENT  
SMITH; SPENCER TAYLOR; BLAKE  
MCDUGAL; and MARY STREET,

Defendants.

**STIPULATED MOTION  
TO EXTEND CERTAIN CASE  
DEADLINES**

Case No: 2:23-cv-00936-AMA-CMR

Judge Ann Marie McIff Allen

Magistrate Judge Cecilia M. Romero

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Pursuant to Fed. R. Civ. P. 16(b)(4) and DUCivR 83-6, defendants Kevin Long, Millcreek Commercial Properties, LLC, Colliers International, Brent Smith, Spencer Taylor, Blake McDougal and Mary Street (collectively, “Defendants”), and plaintiffs Kate Grant and Karmann Kasten, LLC (collectively, “Plaintiffs”), through their respective counsel of record in

this matter, hereby stipulate and respectfully move the Court to extend the following deadlines in this case as follows:

- Close of fact discovery: from January 10, 2025 to March 11, 2025;
- Rule 26-(a)(2) expert disclosures (subject and identity of experts) – party(ies) bearing burden of proof: from January 24, 2025 to March 25, 2025;
- Rule 26-(a)(2) expert disclosures (subject and identity of experts) – counter disclosures: from February 14, 2025 to April 15, 2025;
- Rule 26-(a)(2) expert reports – party(ies) bearing burden of proof: from February 21, 2025 to April 22, 2025;
- Rule 26-(a)(2) expert reports – counter reports: from March 21, 2025 to May 21, 2025;
- Last day for expert discovery: from April 25, 2025 to June 25, 2025;
- Deadline for filing dispositive or potentially dispositive motions: from May 9, 2025 to July 11, 2025;
- If the parties do not intend to file dispositive or potentially dispositive motions, a scheduling conference will be held for purposes of setting a trial date: from May 15, 2025 to TBD; and
- Evaluate case for settlement/ADR: from January 10, 2025 to March 11, 2025.

Good cause exists for the requested extensions because the parties need additional time to conduct fact discovery; to conduct expert discovery; and to complete the other work and deadlines referenced above.

A copy of the proposed Order Extending Certain Case Deadlines is attached as Exhibit  
“A.”

DATED this 4<sup>th</sup> day of December, 2024.

**PARR BROWN GEE & LOVELESS**

By: /s/ Bentley J. Tolk  
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John Keiter

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**RAY QUINNEY & NEBEKER P.C.**By: /s/ Justin T. Toth

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*Attorneys for Defendant Blake McDougal***STRONG & HANNI**By: /s/ Stuart H. Schultz

Stuart H. Schultz

*Attorneys for Defendant Mary Street*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of December, 2024, I caused to be served a true and correct copy of the foregoing **STIPULATED MOTION TO EXTEND CERTAIN CASE DEADLINES** via the CM/ECF system, which automatically provided notice to all counsel of record.

/s/ Bentley J. Tolk